

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Pennsylvania National Mutual Casualty
Insurance Company,

Petitioner,

v.

New England Reinsurance Corporation
and Hartford Fire Insurance Company,

Respondents.

Case No.: 1:18-mc-00278-JEJ

Related Actions: 1:18-mc-00653-JEJ
1:18-mc-00656-JEJ

ORAL ARGUMENT REQUESTED

**EVEREST REINSURANCE COMPANY'S
MOTION TO INTERVENE AND TO UNSEAL JUDICIAL DOCUMENTS**

In accordance with Federal Rule of Civil Procedure 24 and the public right of access to judicial documents, Everest Reinsurance Company (“Everest”) files this motion to intervene and to unseal Exhibits A and C to the petition to confirm an arbitration award filed by Pennsylvania National Mutual Casualty Insurance Company in this action. With this motion, Everest also files its Memorandum of Law in Support of its Motion to Intervene and to Unseal Judicial Documents, a Table of Unpublished Authorities, a Certification of Counsel in support of the

Motion, a Table of Exhibits, a Certificate of Nonconcurrence, and a proposed order.

Dated: January 22, 2019

Respectfully submitted,

SAIBER LLC

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